## **BOEHM, KURTZ & LOWRY**

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RECEIVED

AUG 22 2014

PUBLIC SERVICE COMMISSION

Via Overnight Mail

August 21, 2014

Mr. Jeff Derouen, Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40602

Re: <u>Case No. 2014-00230</u>

Dear Mr. Derouen:

Please find enclosed the original and ten (10) copies each of KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC's (KIUC) MOTION TO INTERVENE and its PETITION TO AMEND PROCEDURAL SCHEDULE for filing in the above-referenced matter.

By copy of this letter, all parties listed on the Certificate of Service have been served. Please place this document of file.

Very Truly Yours,

Michael L. Kurtz, Esq. Kurt J. Boehm, Esq. Jody Kyler Cohn, Esq.

**BOEHM, KURTZ & LOWRY** 

MLKkew Attachment

cc.

Certificate of Service Quang Nyugen, Esq. Richard Raff, Esq.

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served by electronic mail (when available) and by regular, U.S. mail, unless other noted, this 21<sup>st</sup> day of August, 2014 to the following:

Michael L. Kurtz, Esq. Kurt J. Boehm, Esq. Jody Kyler Cohn, Esq.

Roger Hickman Regulatory Affairs Manager Big Rivers Electric Corporation 201 Third Street P. O. Box 24 Henderson, KY 42420



## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

AUG 2 2 2014

PUBLIC SERVICE COMMISSION

IN THE MATTER OF: THE APPLICATION OF THE FUEL: ADJUSTMENT CLAUSE OF BIG RIVERS ELECTRIC: CORPORATION FROM NOVEMBER 1, 2013 THROUGH APRIL:

Case No. 2014-00230

30, 2014

## MOTION TO INTERVENE OF KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

Pursuant to K.R.S. §278.310 and 807 KAR 5:001, Section 4(11), Kentucky Industrial Utility Customers, Inc. ("KIUC") requests that it be granted full intervenor status in the above-captioned proceeding and states in support thereof as follows:

- 1. KIUC is an association of the largest electric and gas public utility customers in Kentucky. The purpose of KIUC is to represent the industrial viewpoint on energy and utility issues before this Commission and before all other appropriate governmental bodies. The members of KIUC who purchase electricity from Big Rivers Electric Corporation and who will participate herein are: Aleris International, Inc., Domtar Paper Co., LLC, and Kimberly Clark Corporation. KIUC will supplement the names of additional intervenors when necessary.
- 2. The matters being decided by the Commission in this case may have a significant impact on the rates paid by KIUC for electricity. Electricity represents a significant cost of doing business for KIUC. The attorneys for KIUC authorized to represent them in this proceeding and to take service of all documents are:

Michael L. Kurtz, Esq. Kurt J. Boehm, Esq. Jody Kyler Cohn, Esq. BOEHM, KURTZ & LOWRY 36 East Seventh Street, Suite 1510 Cincinnati, Ohio 45202

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jkylercohn@BKLlawfirm.com

3. The position of KIUC cannot be adequately represented by any existing party. KIUC intends to play a constructive role in the Commission's decision-making process herein and KIUC's participation will not unduly prejudice any party.

WHEREFORE, KIUC requests that it be granted full intervenor status in the above captioned proceeding.

Respectfully submitted,

Michael L. Kurtz, Esq. Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq. **BOEHM, KURTZ & LOWRY** 

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COUNSEL FOR KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

August 21, 2014